

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

National Association for the Advancement of  
Colored People, Inc. by and through its Myrtle  
Beach Branch, Simuel Jones, Leslie Stevenson,  
and Cedric Stevenson,

Plaintiffs,

v.

City of Myrtle Beach, a municipal corporation  
within the State of South Carolina and City of  
Myrtle Beach Police Department, a department  
of the City of Myrtle Beach,

Defendants.

C.A. NO. 4:18-CV-00554-DCC

**AFFIDAVIT OF CATHIE RHODES**

Cathie Rhodes with the Myrtle Beach Police Department (“MBPD”) affirms the following:

1. I have been a Class 2 law enforcement officer with the MBPD for almost 16 years.
2. I am currently the Support Services Manager for the MBPD.
3. Part of my duties with the MBPD includes maintaining the data on the MBPD’s Computer Aided Dispatch system (“CAD”) and the Records Management System (“RMS”).
4. The CAD and RMS keep a log of MBPD’s calls for service and the resulting reports.
5. The data in CAD and RMS is made at or near the time of the event by someone with knowledge.
6. The data in CAD and RMS is kept in the course of MBPD’s regular activity, and creating the data is part of MBPD’s regular activity.
7. Using the MBPD’s CAD and RMS, I created the following graphs: Motor Vehicle Accident with Injury Calls for Service; Myrtle Beach Response Times during Loop Hours; and Memorial Day Weekend Serious Crimes Reported.

8. I created the graph entitled Horry County Fire Rescue Response Times using data provided to me by Renee Hardwick with Horry County.

**Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on**

March 24, 2018

  
Support Services Manager Cathie Rhodes